

FILED  
Clerk  
District Court

OCT 19 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

STEPHEN J. NUTTING, ESQ.  
WHITE & NUTTING, LLC  
P. O. Box 5222  
Saipan, MP 96950  
Telephone: (670) 234-6547  
Facsimile: (670) 234-9537

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU  
JING JI,

CASE NUMBER CV 05-0019

Plaintiffs,

vs.

**PRE-DISCOVERY  
DISCLOSURE STATEMENT**

JUNG JIN CORPORATION, a CNMI  
corporation, ASIA ENTERPRISES INC.,  
a CNMI corporation, PARK HWA SUN  
and KIM HANG KWON,

Defendants.

COME NOW, JUNG JIN CORPORATION, ASIA ENTERPRISES INC., PARK HWA SUN  
and KIM HANG KWON, defendants in the above-entitled action, by and through their undersigned  
counsel, and pursuant to the Civil Justice Reform Act to make the following pre-discovery  
disclosure:

1. Name of individuals likely to have discoverable information:

a. Name: Park Hwa Sun  
Address: c/o White and Nutting, LLC  
P.O. Box 5222  
Saipan, MP 96950  
Telephone No.: (670) 234-6547

a. Name: Kim Hang Kwon

1 Address: c/o White and Nutting, LLC  
2 P.O. Box 5222  
3 Telephone No.: Saipan, MP 96950  
(670) 234-6547

4 The above-listed persons should have information regarding the employment circumstance  
5 of plaintiffs in relation to their claims.  
6

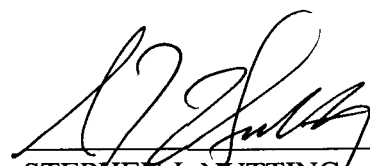
7 2. Description of documents in the possession of Defendants.

- 8 a. Plaintiffs' time records and payroll sheets dating from 12/31/02 through  
9 5/2/05;  
10  
11 b. Plaintiffs' Department of Labor's work contract application/renewal;  
12  
13 c. Plaintiffs' payroll checks dating from 1/16/03 through 4/4/05.

14 3. Disclosure of expert testimony: At this time, Defendants does not anticipate the need  
15 for any expert testimony. If discovery unveils the need for expert testimony, Defendants will make  
16 the required disclosures to the Court and the Plaintiffs by supplemental filing pursuant to Fed. R.  
17 Civ. Pro. 26(e)(1) as soon as possible following the discovery of the need for such testimony.

18 Defendants through their attorney, Stephen J. Nutting, submits that they have fully complied  
19 with the initial disclosures required by the Civil Justice Reform Act plan. If Plaintiffs have any  
20 questions regarding the information contained herein, or seeks additional information they believe  
21 may have been omitted in this disclosure, Defendants will comply with any request for information  
22 in their possession as required by the Civil Justice Reform Act plan.  
23  
24

25 DATED this 18<sup>th</sup> day of October, 2005.

26  
27   
28 STEPHEN J. NUTTING  
Attorney for Defendants